

UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF NEW YORK

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GOVERNMENT EMPLOYEES INSURANCE CO.,  
GEICO INDEMNITY CO., GEICO GENERAL  
INSURANCE COMPANY and  
GEICO CASUALTY CO.,

Plaintiffs,

-against-

AXIAL CHIROPRACTIC P.C.,  
AXIAL CHIROPRACTIC P.C.,  
ACTION CHIROPRACTIC P.C.,  
ACTION CHIROPRACTIC P.C.,  
BRUCE BROMBERG, D.C.,  
LEFCORT MUA CHIROPRACTIC, P.C.,  
LAWRENCE LEFCORT, D.C.,  
GLENN ROSENBERG, D.C., P.C. d/b/a SOUTH SHORE  
SPINAL CARE,  
GLENN ROSENBERG, D.C.,  
DAVID MARCUS COTY, D.C.,  
ROBERT LUCA, D.C., and  
ARCHER IRBY, D.C.,

Defendants.  
-----X

Docket No.:

1:19-cv-05570-ENV-VMS

**NOTICE OF MOTION  
PURSUANT TO FED. R.  
CIV. P. 15, 16, AND 21  
FOR LEAVE TO AMEND  
THE COMPLAINT AND  
ADD ADDITIONAL  
DEFENDANTS**

**PLEASE TAKE NOTICE** that Plaintiffs Government Employees Insurance Company, GEICO Indemnity Company, GEICO General Insurance Company, and GEICO Casualty Company (collectively “Plaintiffs” or “GEICO”) respectfully move, pursuant to Fed. R. Civ. P. 1, 16, and 21 to re-open the deadline for amendments, for leave to amend the complaint, and add additional defendants.

**PLEASE TAKE FURTHER NOTICE** that Plaintiffs intend to file and serve reply papers in further support of this motion, to the extent that the Defendants serve opposition papers.

Dated: Uniondale, New York  
February 1, 2021

Respectfully submitted,

By: /s/ Steven T. Henesy

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Insurance Company, GEICO Indemnity Company,  
GEICO General Insurance Company, and GEICO  
Casualty Company*